

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA**

**Plaintiff,**

**v.**

**COMMONWEALTH OF PUERTO RICO,  
et. al.**

**Defendants.**

**CIVIL NO. 12-2039 (GAG)**

**JOINT MOTION REQUESTING AN EXTENSION OF TIME TO COMPLY WITH  
ORDER AT DOCKET NO. 624**

**TO THE HONORABLE COURT:**

**COME NOW** Plaintiff, the United States of America (USDOJ), and Defendants, the Commonwealth of Puerto Rico and the Puerto Rico Police Department (PRPD) (collectively, the Parties), through undersigned counsel, and respectfully allege and pray as follows:

1. On October 4, 2017, this Honorable Court issued an Order in this case regarding the aftermath of Hurricane Maria. The Court's Order requested that the Parties, in collaboration with the TCA, "and ultimate court approval," "prospectively adopt a new framework that considers the post Maria scenario now part of the equation, and the vastly diminished resources presently available." (See Docket 624 at 2)

2. The Court further instructed the Parties to revise existing deadlines and agree to realistic ones because the current "ongoing timeframes were set under a scenario that has now changed." *Id.* at ¶ 1. The Parties agree with the Court's reasoning

that it is unrealistic to expect that PRPD achieve and continue its scheduled progress established by the Action Plans under the present conditions, more so when the Commonwealth and PRPD's personnel resources are principally committed to disaster relief efforts and performing essential law enforcement activities throughout the island while ensuring adherence to civil rights protections. (See Docket 624, p.2, ¶1)

3. Notwithstanding, in order to comply with the Court's Order at docket No. 624, the Parties and the TCA have participated in several meetings to discuss the current state of the reform process in light of Hurricane Maria's aftermath and determine a forward-looking framework that it is needed to accommodate the new scenario and continue Police reform efforts.

4. However, the Parties understand that more time is needed in order to adequately inform the Court of the new deadlines that are necessary to continue the Police reform efforts set forth in the Action Plans under the current circumstances.

5. Because of limitations on travel due to conditions on the island and resources needed by emergency personnel, USDOJ was unable to staff an intended tour during the month of October 2017. Absent unforeseen circumstances, USDOJ plans to conduct a tour from November 13 to 17, 2017, to meet with Defendants in order to discuss changes to Action Plan deadlines.

6. Consequently, the Parties jointly request that an extension of time be granted until December 1, 2017, to allow the parties and TCA to continue to confer and reach agreement on changed timelines in order to accommodate the changed circumstances, and inform this Honorable Court of a new framework that considers the impact of Hurricane Maria, and the vastly diminished resources presently available.

**WHEREFORE**, it is respectfully requested from this Honorable Court to take notice of the above stated and grant this instant motion for an extension of time.

**I HEREBY CERTIFY** that on this same date, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system, which will send notification of such filing to all attorneys of record.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, on October 24, 2017.

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